

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

QUALCOMM INCORPORATED, a
Delaware corporation, and
QUALCOMM TECHNOLOGIES,
INC., a Delaware corporation,

Plaintiffs,

v.

ARM HOLDINGS PLC., f/k/a ARM LTD.,
a U.K. corporation,

Defendant.

C.A. No. 24-490-MN

PUBLIC VERSION - FILED JULY 22, 2025

**DECLARATION OF LUCIA SUN IN SUPPORT OF NONPARTY MEDIATEK INC.'S
MOTION FOR PROTECTIVE ORDER**

I, Lucia Sun, declare as follows:

1. I am over the age of 18 and am employee of MediaTek Inc. ("MediaTek"), with responsibility for the maintenance of the relationship between MediaTek and its EDA (electronic design automation) tools and third-party IP suppliers. My responsibilities include the evaluation of EDA tool and IP suppliers, the negotiation of commercial terms, and the ongoing execution and management of agreements with these suppliers. I have been employed by MediaTek since 2014. If called as a witness, I could and would testify competently to the information set forth in this Declaration.

2. I make this Declaration in support of Nonparty MediaTek's Motion for a Protective Order. I am familiar with and have reviewed [REDACTED]

[REDACTED]
[REDACTED]

I am also familiar with the negotiation process of these agreements.

3. MediaTek is an innovative fabless semiconductor company specialized in the design of integrated circuits of various applications, including mobile communications devices such as smartphones, tablet computers, smart home appliances, connectivity, artificial intelligence, automotive electronics, and more. Plaintiffs Qualcomm Inc. and Qualcomm Technologies, Inc. (together “Qualcomm”) directly compete with MediaTek in the semiconductor space. For instance, both companies are leaders in producing smartphone systems on chips (“SoCs”) for use with the Android operating system. Both companies also have entered into agreements with ARM to incorporate ARM-licensed CPU technology into their SoCs. MediaTek routinely pitches against Qualcomm for significant business opportunities in these markets and competes with Qualcomm across many industry sectors to develop the best chips to meet end customers’ needs. MediaTek’s ARM-licensed CPU technology is a key component in many of these competitive products.

4. The agreements requested for production include MediaTek’s trade secrets and highly sensitive competitive information. Specifically, the information in [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5. The TLA’s definition of “Confidential Information” includes, among things “terms and conditions of this TLA.” Further Section 3.1 of the TLA restricts disclosure of “Confidential Information:”

Restricted Disclosure. Except as expressly provided by Clauses 3.2, 3.3, 3.4, 3.5, 3.6 and 3.7, each party shall maintain in confidence the Confidential Information disclosed by the other party and apply security measures no less stringent than the measures that such party applies to its own like information, but not less than a reasonable degree of care, to prevent unauthorised disclosure and use of the Confidential Information. The period of confidentiality shall be indefinite with respect to each party's Confidential Information.

Section 3.6 of the TLA further provides that any party required to make disclosure of Confidential Information pursuant to a court order must "promptly notif[y] the other party" and "give[] the other party a reasonable opportunity to contest or limit the scope of such required disclosure (including but not limited to making an application for a protective order)[.]"

[REDACTED]

[REDACTED]

[REDACTED]

6. MediaTek treats information within these agreements, including information regarding MediaTek's pricing, royalty rates, and ARM product information [REDACTED] [REDACTED] with heightened sensitivity internally and externally. These agreements are not shared externally. Internally within MediaTek, only those employees who have a need to know as part of their role and responsibilities have access to these agreements on the recordkeeping platform. The recordkeeping platform is only available within MediaTek's intranet and is subject to necessary security measures such as user authentication and regular security reviews.

7. MediaTek would suffer serious competitive injury if the [REDACTED] [REDACTED] were produced to Qualcomm, its exceptionally close direct competitor. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury under the laws of the United States of America
that the foregoing is true and correct.

Executed this 11th day of July, 2025 in Hsinchu, Taiwan.



Lucia Sun

MediaTek Inc.